

VENABLE LLP  
8010 Towers Crescent Drive, Suite 300  
Vienna, Virginia 22182-2707  
Telephone: (703) 760-1647  
Facsimile: (703) 821-8949  
Lawrence A. Katz (*Pro Hac Vice*)

- and -

VENABLE LLP  
Rockefeller Center, 25th Floor  
1270 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 307-5500  
Facsimile: (212) 307-5598  
Edward A. Smith

*Attorneys for Simpson Automotive Group, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
	:	
In re	:	Chapter 11
	:	
GENERAL MOTORS CORP., <i>et al.</i>	:	Case No. 09-50026 (REG)
	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
-----	X	

**WITHDRAWAL OF PROTECTIVE OBJECTION OF SIMPSON AUTOMOTIVE  
GROUP, INC. TO DEBTORS' PROPOSED CURE AMOUNTS**

Simpson Automotive Group, Inc., by counsel, hereby withdraws its Protective

Objection to Debtors' Proposed Cure Amounts filed on June 19, 2009 [Docket No. 1982].

Dated: October 13, 2009

Respectfully submitted,

VENABLE LLP

By: /s/ Lawrence A. Katz  
Lawrence A. Katz (*Pro Hac Vice*)  
8010 Towers Crescent Drive, Suite 300  
Vienna, Virginia 22182-2707  
Telephone: (703) 760-1600  
Facsimile: (703) 821-8949  
Email: lakatz@venable.com

- and -

Rockefeller Center, 25th Floor  
1270 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 307-5500  
Facsimile: (212) 307-5598  
Edward A. Smith

*Counsel to Simpson Automotive Group, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of the foregoing Withdrawal of Protective Objection of Simpson Automotive Group, Inc. to Debtors' Proposed Cure Amounts to be served on the 13th day of October, 2009, via first class mail, postage prepaid, upon the following:

General Motors Corporation  
Cadillac Building  
30009 Van Dyke Avenue  
Warren, MI 48090-9025  
Attn: Warren Command Center,  
Mailcode 408-206-114

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153  
Attn: Harvey R. Miller, Esq.  
Stephen Karotkin, Esq.  
Joseph H. Smolinsky, Esq.

U.S. Treasury  
1500 Pennsylvania Avenue NW  
Room 2312  
Washington, DC 20220  
Attn: Matthew Feldman, Esq.

Cadwalader, Wickersham, & Taft LLP  
One World Financial Center  
New York, NY 10281  
Attn: John J. Rapisardi, Esq.

Vedder Price, P.C.  
1633 Broadway  
47<sup>th</sup> Floor  
New York, NY 10019  
Attn: Michael J. Edelman, Esq.  
Michael L. Schein, Esq.

United States Trustee  
33 Whitehall Street  
21<sup>st</sup> Floor  
New York, NY 10004  
Attn: Diana G. Adams, Esq.

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas  
New York, NY 10036  
Attn: Gordon Z. Novod, Esq.

/s/ Lawrence A. Katz  
Lawrence A. Katz